

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Fairfield Sentry Limited, et al.,

Debtors in Foreign Proceedings.

Fairfield Sentry Limited (In Liquidation),

Plaintiff

-against-

Theodoor GGC Amsterdam, et al.

Defendants.

This Notice of Motion to Dismiss is related to
the following Adversary Proceedings:

10-03635

10-03636

Chapter 15 Case

Case No. 10-13164 (BRL)

Jointly Administered

Adv. Pro. No. 10-03496 (BRL)

Administratively Consolidated

ORAL ARGUMENT REQUESTED

**NOTICE OF HEARING ON
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

PLEASE TAKE NOTICE that, on October 29, 2021, Defendant BBVA (Suisse) SA (“BBVA” or “Defendant”), filed its Motion to Dismiss for Lack of Personal Jurisdiction (the “Motion”) pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure, in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Scheduling Order on Personal Jurisdiction Briefing entered on September 28, 2021 (the “Scheduling Order”) a hearing to consider the Motion will be held on Wednesday, April 20, 2022, at 10:00 a.m. (prevailing

Eastern time) in the courtroom of The Honorable Chief Judge Cecelia G. Morris, United States Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Scheduling Order, oppositions to the Motion, if any, shall be filed by Tuesday, March 15, 2022, and replies in further support of the Motion shall be filed by Thursday, March 31, 2022.

Dated: October 29, 2021

Respectfully Submitted,

WINSTON & STRAWN LLP

By: /s/ Keith R. Palfin

Heather Lamberg
Keith R. Palfin
1901 L Street, N.W.
Washington, D.C. 20036-3506
Telephone: (202) 282-5000
Facsimile: (202) 282-5100
E-mail: hlamberg@winston.com
E-mail: kpalfin@winston.com

Counsel for Defendant BBVA (Suisse) SA